

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: JAMES SIMMONS and	:	
KEISHA SIMMONS	:	
	:	No: 19-01991-RNO
Debtors	:	Chapter 13
	:	

**STIPULATION RESOLVING OBJECTION TO
DEBTORS' MOTION TO INCUR POST-PETITION DEBT**

Now comes Debtors and Creditor, CCP Property Owners Association South (the "Association"), to stipulate to the resolution of Association's *Objection to Debtors' Motion to Incur Post-Petition Debt*, and in support thereof avers:

1. Debtors filed a Motion to Incur Post-Petition Debt on or about March 4, 2021 to borrow certain sums ("the subject loan").
2. Association timely objected to said Motion on March 18, 2021.
3. Through discussions between the parties, Debtors and Association have agreed to the following stipulation to be entered of record and approved by this Honorable Court as follows:
 - A. Association's secured claim (pre-petition debt) totals \$6,057.21;
 - B. Debtors' post-petition delinquency to Association, as of March 31, 2021, is \$4,983.90;
 - C. The sum to be paid by Debtors to Association at the time of the closing of the subject loan is \$11,041.11;
 - D. Effective April 1, 2021, Debtors are to pay post-borrowing assessments to Association on a monthly basis, the current rate being

\$186.13/month for the remainder of 2021, and for those future sums as set by the Association based upon its annual budget; and

- E. In exchange for compliance with items A-D above, Association shall withdraw its *Objection to Debtors' Motion to Incur Debt*.
4. The undersigned represent that they have authority to enter into the present stipulation.
5. The undersigned request to have this stipulation entered as an order of court.

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